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8 *Attorneys for Mark D. Waldron, Chapter 7 Trustee*

6 **UNITED STATES BANKRUPTCY COURT**  
7 **EASTERN DISTRICT OF WASHINGTON**

8 In re:

9 GIGA WATT, Inc., a Washington  
10 corporation,

11 Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit

Chapter 7

11 **NOTICE OF MOTION AND**  
12 **OPPORTUNITY TO OBJECT**

13 **PLEASE TAKE NOTICE THAT** Mark D. Waldron, in his official  
14 capacity as the Chapter 7 Trustee (the “Trustee”) in the above-captioned case, has  
15 filed the *Chapter 7 Trustee’s Motion for Order to Show Cause Why Jun Dam*  
16 *Should Not Be Sanctioned for Violating the Automatic Stay* [ECF 889] (the  
17 “Motion”) and supporting Memorandum [ECF 890], pursuant to which the  
18 Trustee seeks an Order to Show Cause why Jun Dam should not be sanctioned for  
19 violating the automatic stay by filing and prosecuting the action, *Jun Dam v.*  
20 *Perkins Coie LLP, et al*, in the US District Court for the E.D. WA., Case No.  
21 2:2020-cv-00464 (the “District Court Action”). As explained more fully in the

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23  
24 Notice of Motion and  
25 Opportunity to Object – Page 1

1 Motion, the District Court Action violates the automatic stay because it asserts a  
2 cause of action that belongs exclusively to the estate.

3 The Motion and their supporting papers, if any, are located on the Court's  
4 docket and may be obtained from the Court clerk. **Any objection to the**  
5 **Settlement must be served on undersigned counsel and filed with the Court**  
6 **on or before July 15, 2021.** The Motion may be granted and the Court may enter  
7 an Order without an actual hearing or further notice unless a written objection is  
8 timely served and filed.

9 Dated: June 21, 2021

POTOMAC LAW GROUP PLLC

10 By: /s/ Pamela M. Egan  
11 Pamela M. Egan (WSBA No. 54736)  
12 *Attorneys for Mark D. Waldron, Chapter 7*  
13 *Trustee*  
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